

XAVIER GONZALES  
ATTORNEY AT LAW  
A PROFESSIONAL CORPORATION  
8440 W. Lake Mead Blvd. • Ste 201  
Las Vegas, Nevada 89128  
(702) 388-8182 • (702) 388-8181 • Fax: (702) 388-2968  
Website: www.xaviergonzaleslaw.com • E-Mail: secretarya@xglaw.com

XAVIER GONZALES, ESQ.  
Nevada Bar No.: 1862  
8440 W. Lake Mead Blvd, Ste 201  
Las Vegas, Nevada 89128  
(702) 388-8181  
*Attorney for Plaintiffs*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

MOHAMMAD ROSHDI AREF )  
ALSAYYED AHMAD, ) Case No. 2:21-cv-00217-RFB-NJK  
ASSIA MOKHTAR )  
Plaintiffs, )  
v. )  
THE UNITED STATES OF AMERICA; )  
Alejandro MAYORKAS, in his Official Capacity, )  
Secretary, Department of Homeland Security; )  
Monty WILKINSON, in his Official Capacity, )  
Attorney General Department of Justice; )  
Kerri Ann QUIHUIS, in his Official Capacity, )  
ICE Field Office Director, Detention and Removal )  
Las Vegas, Nevada (ICE Local) )  
Defendants )

**STIPULATION AND ORDER TO EXTEND DEADLINE (FIRST REQUEST)**

Pursuant to Local Rules IA 6-1 and 26-4, Plaintiffs Mohammad Roshdi Aref Alsayyed Ahmad, and Assia Mohktar, and Defendants, United States of America, et al., through counsel, submit the following Stipulation to Extend Deadline. This is the first request for an extension to file a Response to Defendants' Motion to Dismiss. The parties enter this stipulation because:

1. On February 10, 2021, Plaintiff filed his Complaint (ECF No. 1).

2. The United States Attorney's Office for the District of Nevada was served on February 19, 2021.

3. On June 16, 2021 Defendants' filed a Motion to Dismiss (ECF No. 11).

4. The requested extension will provide Plaintiffs additional time to submit a thorough response. This extension is necessary to have sufficient time to meaningfully review, consider, and research the relevant legal and factual issues.

5. Accordingly, the parties request that Plaintiffs' Response to the Motion to Dismiss be filed by **July 14, 2021**.

Respectfully submitted this 29th day of June 2021.

CHRISTOPHER CHIOU  
Acting United States Attorney


/s/ Xavier Gonzales  
XAVIER GONZALES, ESQ.  
NV Bar No. 1862  
8440 W. Lake Mead Blvd.  
Suite 201  
Las Vegas, NV 89128

*Attorney for Petitioner*

/s/ Skyler H. Pearson  
SKYLER H. PEARSON  
Assistant United States Attorney

*Attorneys for the United States*

IT IS SO ORDERED

  
**RICHARD E. BOULWARE, II**  
**United States District Court**

DATED this 30th day of June, 2021.